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March 26, 2025

Via ECF Only

The Honorable Ronnie Abrams, USDJ

Southern District of New York

500 Pearl Street

New York, NY 10007

REQUEST FOR ADJOURNMENT OF INITIAL CONFERENCE

Re: Atlantic Casualty Insurance Company v. Bayport Construction Corporation, et al.
Case No. 25-CV-1163(RA)

Dear Judge Abrams,

We are writing on behalf of our client, defendant Bayport Construction Corporation ("Bayport"), as well as the co-defendants in this action, LAM Group and LAM Pearl Street Hotel LLC (the "Co-Defendants"). Plaintiff Atlantic Casualty Insurance Company ("Plaintiff") is also joining in this request. Bayport has recently retained our firm, and in light of this, we respectfully request an extension of the deadlines and initial conference date outlined in the Court's Order and Notice of Initial Conference (ECF No. 7).

Since we have only recently been engaged by Bayport, we require additional time to thoroughly review the claims asserted in the pleadings, prepare appropriate responses, and coordinate with the Co-Defendants and Plaintiff. Plaintiff's counsel has also agreed to extend our time to answer to April 25, 2025. We believe that this extension will allow all parties to adequately prepare for the initial conference, ensure compliance with the Court's Order, and align all parties from the outset.

Accordingly, Plaintiff's counsel and counsel for the Co-Defendants have consented to this request for an extension. We respectfully request that the deadline for submitting the joint letter outlining the case details, as set forth in the Court's Order, along with the proposed case management plan and scheduling order, be extended to May 2, 2025. Additionally, we request that the initial status conference be adjourned to a later date, at the Court's convenience.

We greatly appreciate the Court's consideration of this request and remain at your disposal for any additional information or clarification. Thank you for your attention to this matter.

Application granted. Defendants shall answer no later than April 25, 2025. The initial teleconference is adjourned to May 30, 2025 at 11:00 a.m. The parties shall file their joint letter, case management plan and scheduling order no later than May 23, 2025.

SO ORDERED.



Hon. Ronnie Abrams

March 27, 2025

Respectfully submitted,
GUTMAN WEISS, P.C.

/s/Marc Illish

Marc Illish, Esq.